

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 12 C 3387
)	
AMERICAN STEELWORKS, INC.,)	JUDGE JOHN Z. LEE
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, AMERICAN STEELWORKS, INC., an Illinois corporation, in the total amount of \$20,123.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,971.00.

On May 14, 2012, the Summons and Complaint was served on the Corporation's President, Lori Parker-Psencik, (by tendering a copy of said documents to Edypa Wileczek) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 4, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 11th day of July 2012:

Lori Parker-Psencik, Registered Agent/President
American Steel Works, Inc.
1985 Anson Drive
Melrose Park, IL 60160

Daniel C. McCabe
McCabe Miller, LLC
212 W. Kinzie Street, Suite 400
Chicago, IL 60654

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com